

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT**

for the

District of New Mexico

United States District Court  
Albuquerque, New MexicoMitchell R. Elfers  
Clerk of Court

United States of America )

v. )

TYLYNN WILLIE  
(year of birth 1989) )Case No. **24mj1215**\_\_\_\_\_  
*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 18, 2024 in the county of San Juan in the  
\_\_\_\_\_  
District of New Mexico, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. § 1153  
18 U.S.C. § 1111Offenses committed within Indian Country  
Murder

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.  
*Complainant's signature*

Andrew Wright, Special Agent FBI

*Printed name and title*

Telephonically sworn and electronically signed.

Date: 08/20/2024*Judge's signature*City and state: Farmington, New Mexico

Hon. B. Paul Briones, U.S. Magistrate Judge

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

VS

TYLYNN WILLIE  
Year of birth: 1989

Case No. \_\_\_\_\_

AFFIDAVIT IN SUPPORT OF  
PROBABLE CAUSE ARREST

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Andrew Wright, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is made in support of a Criminal Complaint and an Arrest Warrant for TYLYNN WILLIE (hereinafter referred to as WILLIE), year of birth 1989.

2. I am currently serving as an FBI Special Agent assigned to the FBI, Albuquerque Division, Farmington Resident Agency, where I primarily investigate crimes that occur in Indian Country to include homicide, aggravated assault, child sexual assault, kidnapping and rape. I have been with the FBI for approximately 3 years. I received on the job training from other experienced agents, detectives, Indian Country criminal investigators, and tribal police officers. My investigative training and experience include, but is not limited to, processing crime scenes, conducting surveillance, interviewing subjects and witnesses, writing affidavits for executing search warrants and arrest warrants, examining cellular telephones, managing confidential human sources and cooperating witnesses/defendants, serving subpoenas, collecting evidence and analyzing public records.

3. The information set forth in this affidavit was derived from my own investigation and/or communicated to me by other sworn law enforcement officers. Because this affidavit is submitted for the limited purpose of securing a criminal complaint, I have not included each

and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish the probable cause to support a criminal complaint and arrest of WILLIE for criminal statutes 18 U.S.C. § 1153, crimes committed in Indian Country, 18 U.S.C. § 1111 murder.

PROBABLE CAUSE

4. On or about August 18, 2024, the FBI was notified by the Navajo Nation Department of Criminal Investigations (NNDICI) of a homicide against a male (hereinafter referred to as JOHN DOE), year of birth 2003, which took place at the Nizhoni Park (The Park), Shiprock, New Mexico 87420.

5. On August 18, 2024, an individual with initials A.H. (hereinafter referred to as WITNESS 1) year of birth 1981, arrived at the Navajo Nation Police Department and reported an assault which took place at The Park. WITNESS 1 explained that the Suspect was a female who looks like a male hit JOHN DOE with wood. When WITNESS 1 left The Park, JOHN DOE was laying on the ground and the Suspect had begun to depart the area traveling eastbound towards Truck Route Road.

6. The Suspect was later identified as TYLYNN WILLIE, Year of Birth 1989.

7. When officers from the Navajo Nation Police department arrived, they found JOHN DOE unconscious with head trauma. JOHN DOE was transported by emergency medical services to the hospital where he later succumbed to his injuries.

8. On August 20, 2024, FBI and NNCI investigators conducted an interview with WITNESS 1. WITNESS 1 disclosed they were at the park with a relative playing basketball at the basketball courts in The Park. While playing WITNESS 1 observed the Suspect approach The Park from the East. The Suspect was described as dressed like a “Tomboy” with a shaved

head, wearing a black sweater. The Suspect was shorter than WITNESS 1 by a few inches and heavy set.

9. The Suspect then came onto the basketball court and asked to shoot the ball WITNESS 1 was using. WITNESS 1 gave the ball to the Suspect at which point the Suspect shot the ball. The Suspect then went to the gazebo in The Park, which is approximately 25 – 35 yards away from the basketball court.

10. WITNESS 1 then disclosed that when the Suspect entered the gazebo, the Suspect sat on a picnic table which was directly behind another table where JOHN DOE was sitting. JOHN DOE was faced away from the Suspect. The Suspect sat for a while looking around. At some point the Suspect stood up and retrieved what appeared to be a piece of wood with something wrapped around it. The Suspect then approached JOHN DOE and began to hit JOHN DOE from behind.

11. WITNESS 1 and the relative then returned to their vehicle and drove to the police department to report the incident. While departing The Park WITNESS 1 observed the Suspect walking in the same direction the Suspect had come from. WITNESS 1 stated that he could identify Suspect if shown a photo of the Suspect. WITNESS 1 was unaware of Suspect's true identity at the time of the incident.

12. On August 20, 2024, investigators interviewed an individual with initials A.B. (hereinafter referred to as WITNESS 2), year of birth 1994. Investigators located WITNESS 2 was at The Park. WITNESS 2 was provided the physical description of the Suspect as described by WITNESS 1. WITNESS 2 knew a person named "Tylynn" who matched the description and frequents The Park. WITNESS 2 did not know Tylynn's lastname. WITNESS 2 stated that "Tylynn" lives on Truck Route in a little house with a little black car parked in front. WITNESS 2 used a map on a cellular device and was able to show investigators "Tylynn's" residence.

13. Based on the information known about the potential suspect's first name and address, Investigate conducted a database search and located a booking photo of a TYLYNN WILLIE who lived at the address identified by WITNESS 2. Investigators showed the photo to WITNESS 2. WITNESS 2 identified the person in the photo as the same person they knew as "Tylynn" who frequented The Park and lived on Truck Route in the little house.

14. On August 20, 2024, WITNESS 1 met with investigators from the FBI for the purpose of conducting a photo lineup. All 6 photos were numbered 1 – 6 and were shown in numerical order. The photos were shown one at a time without any identifying information. Each photo was removed before showing the next photo. In the photo lineup WITNESS 1 identified the individual depicted in photo #3 with 100% certainty as the person who he saw hitting JOHN DOE with the piece of wood. Photo number 3 in the photo array presented to WITNESS 1 is a photo of WILLIE.

15. The incident location was within the boundaries of the Navajo Nation according to NNDCL.

16. WILLIE and JOHN DOE are enrolled members of the Navajo Nation.

#### CONCLUSION

17. Based on my training, experience, and the facts as set forth in this affidavit, your affiant submits there is probable cause to believe WILLIE violated federal criminal statutes, 18 U.S.C. § 1153, crimes committed in Indian Country, 18 U.S.C. § 1111 murder.

18. Supervisory Assistant United States Attorney Elisa Dimas reviewed and approved this affidavit for legal sufficiency to establish probable cause.

  
\_\_\_\_\_  
Andrew Wright  
Special Agent

Federal Bureau of Investigation

Electronically SUBSCRIBED and telephonically SWORN to me on August 20, 2023.

A handwritten signature in black ink that reads "B Paul Briones". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

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B. Paul Briones  
United States Magistrate Judge